

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF  
DELAWARE; STATE OF CALIFORNIA; STATE  
OF COLORADO; STATE OF ARIZONA; STATE  
OF CONNECTICUT; DISTRICT OF COLUMBIA,  
STATE OF HAWAI‘I; STATE OF ILLINOIS;  
OFFICE OF THE GOVERNOR *ex rel.* Andy  
Beshear, in his official capacity as Governor of the  
COMMONWEALTH OF KENTUCKY; STATE OF  
MAINE; COMMONWEALTH OF  
MASSACHUSETTS; PEOPLE OF THE STATE OF  
MICHIGAN; STATE OF MINNESOTA; STATE OF  
NEVADA; STATE OF NEW JERSEY; STATE OF  
NEW MEXICO; STATE OF NEW YORK; STATE  
OF NORTH CAROLINA; STATE OF OREGON;  
JOSH SHAPIRO, in his official capacity as  
Governor of the COMMONWEALTH OF  
PENNSYLVANIA; STATE OF RHODE ISLAND;  
STATE OF VERMONT; STATE OF  
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND  
COMMUNITY SERVICE, operating as  
AmeriCorps; and JENNIFER BASTRESS  
TAHMASEBI, in her official capacity as Interim  
Head of the Corporation for National and  
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

**PLAINTIFF STATES’ MOTION FOR A  
5 U.S.C. § 705 STAY AND PRELIMINARY INJUNCTION**

For reasons explained in greater detail in the accompanying memorandum of law, Plaintiff States move for an order entering a stay under section 705 of the Administrative Procedure Act (APA), 5 U.S.C. § 705, and a preliminary injunction against all Defendants,

1. Vacating Defendants' acts, omissions, or both, directing, providing for, intended to accomplish, or effectuating the dismantling of AmeriCorps, specifically:
  - a. Vacating, with respect to all NCCC members assigned to placements in Plaintiff States, Defendants' acts undertaken on or around April 15, 2025, to release all NCCC members from the AmeriCorps program effective April 30, 2025;
  - b. Vacating, throughout the United States, Defendants' acts undertaken on or around April 15, 2025, to place approximately 85% of AmeriCorps staff on administrative leave;
  - c. Vacating, throughout the United States, Defendants' acts undertaken on or around April 24, 2025, to institute a reduction in force for AmeriCorps staff;
  - d. Vacating, with respect to programs located in Plaintiff States, Defendants' acts undertaken on or around April 25, 2025, to terminate approximately 1,031 AmeriCorps programs and associated funding;
2. Enjoining, pending further order of the Court, Defendants, their agents, and anyone acting at Defendants' direction, from reissuing, adopting, implementing, giving effect to, or reinstating under a different name or means any of the foregoing acts; and
3. Requiring Defendants to file, within one week of entry of this order, a Status Report documenting the actions that they have taken to comply with the Court's order.

Dated: May 6, 2025

Respectfully submitted,

**ANTHONY G. BROWN**  
ATTORNEY GENERAL OF MARYLAND

**KATHLEEN JENNINGS**  
ATTORNEY GENERAL OF DELAWARE

By: /s/ Keith M. Jamieson

By: /s/ Ian R. Liston

Keith M. Jamieson (D. Md. Bar. No. 31543)  
Virginia Williamson (D. Md. Bar. No. 31472)  
*Assistant Attorneys General*  
Federal Accountability Unit  
Office of the Attorney General  
200 Saint Paul Place  
Baltimore, Maryland 21202  
(410) 576-6960  
[kjamieson@oag.state.md.us](mailto:kjamieson@oag.state.md.us)

*Counsel for the State of Maryland*

**ROB BONTA**

ATTORNEY GENERAL OF CALIFORNIA

By: /s/ Ezra Kautz  
Ezra Kautz\*  
*Deputy Attorney General*  
Joel Marrero\*  
William H. Downer\*  
*Supervising Deputy Attorneys General*  
Brian Bilford\*  
*Deputy Attorney General*  
Michael L. Newman\*  
*Senior Assistant Attorney General*  
California Department of Justice  
1300 I Street  
Sacramento, CA 95814  
(916) 210-6346  
[Joel.Marrero@doj.ca.gov](mailto:Joel.Marrero@doj.ca.gov)  
[William.Downer@doj.ca.gov](mailto:William.Downer@doj.ca.gov)  
[Ezra.Kautz@doj.ca.gov](mailto:Ezra.Kautz@doj.ca.gov)  
[Brian.Bilford@doj.ca.gov](mailto:Brian.Bilford@doj.ca.gov)  
[Michael.Newman@doj.ca.gov](mailto:Michael.Newman@doj.ca.gov)

*Counsel for the State of California*

**KRISTIN K. MAYES**

ATTORNEY GENERAL OF ARIZONA

By: /s/ Joshua A. Katz  
Joshua A. Katz\*  
*Assistant Attorney General*  
Office of the Arizona Attorney General

Ian R. Liston\*  
*Director of Impact Litigation*  
Vanessa L. Kassab\*  
*Deputy Attorney General*  
Delaware Department of Justice  
820 N. French Street  
Wilmington, DE 19801  
(302) 683-8899  
[Ian.Liston@delaware.gov](mailto:Ian.Liston@delaware.gov)

*Counsel for the State of Delaware*

**PHILIP J. WEISER**

ATTORNEY GENERAL OF COLORADO

By: /s/ Kyle M. Holter  
David Moskowitz\*  
*Deputy Solicitor General*  
Sarah H. Weiss\*  
*Senior Assistant Attorney General*  
Kyle M. Holter\*  
Sam Wolter\*  
*Assistant Attorneys General*  
Colorado Office of the Attorney General  
1300 Broadway, #10  
Denver, CO 80203  
(720) 508-6000  
[david.moskowitz@coag.gov](mailto:david.moskowitz@coag.gov)  
[sarah.weiss@coag.gov](mailto:sarah.weiss@coag.gov)  
[kyle.holter@coag.gov](mailto:kyle.holter@coag.gov)  
[samuel.wolter@coag.gov](mailto:samuel.wolter@coag.gov)

*Counsel for the State of Colorado*

**WILLIAM TONG**

ATTORNEY GENERAL OF CONNECTICUT

By: /s/ Andrew Ammirati  
Andrew Ammirati\*  
*Assistant Attorney General*  
Connecticut Office of the Attorney General

2005 N. Central Ave.  
Phoenix, Arizona 85004  
(602) 542-3333  
[Joshua.Katz@azag.gov](mailto:Joshua.Katz@azag.gov)

*Counsel for the State of Arizona*

**BRIAN L. SCHWALB**

ATTORNEY GENERAL FOR THE DISTRICT OF  
COLUMBIA

By: /s/ Andrew C. Mendrala  
Andrew C. Mendrala\*  
*Assistant Attorney General*  
Public Advocacy Division  
Office of the Attorney General for the District  
of Columbia  
400 Sixth Street, NW  
Washington, D.C. 20001  
(202) 724-9726  
[Andrew.mendrala@dc.gov](mailto:Andrew.mendrala@dc.gov)

*Counsel for the District of Columbia*

**KWAME RAOUL**

ATTORNEY GENERAL OF ILLINOIS

By: /s/ Abigail R. Durkin  
Abigail R. Durkin\*  
*Assistant Attorney General II, Special  
Litigation Bureau*  
Cara Hendrickson\*  
*Assistant Chief Deputy Attorney General*  
Office of the Illinois Attorney General  
115 South LaSalle Street  
Chicago, IL 60603  
Tel. (312) 814-3000  
[Abigail.Durkin@ilag.gov](mailto:Abigail.Durkin@ilag.gov)  
[Cara.Hendrickson@ilag.gov](mailto:Cara.Hendrickson@ilag.gov)

*Counsel for the State of Illinois*

165 Capitol Ave  
Hartford, CT 06106  
(860) 808-5090  
[Andrew.Ammirati@ct.gov](mailto:Andrew.Ammirati@ct.gov)

*Counsel for the State of Connecticut*

**ANNE E. LOPEZ**

ATTORNEY GENERAL OF HAWAI'I

By: /s/ Kaliko 'onālani D. Fernandes  
David D. Day\*  
*Special Assistant to the Attorney General*  
Kaliko 'onālani D. Fernandes\*  
*Solicitor General*  
Hawai'i Department of the Attorney General  
425 Queen Street  
Honolulu, HI 96813  
(808) 586-1360  
[david.d.day@hawaii.gov](mailto:david.d.day@hawaii.gov)  
[kaliko.d.fernandes@hawaii.gov](mailto:kaliko.d.fernandes@hawaii.gov)

*Counsel for the State of Hawai'i*

**OFFICE OF THE GOVERNOR *ex rel.*  
ANDY BESHEAR**

IN HIS OFFICIAL CAPACITY AS GOVERNOR OF  
THE COMMONWEALTH OF KENTUCKY

By: /s/ S. Travis Mayo  
S. Travis Mayo\*  
*General Counsel*  
Taylor Payne\*  
*Chief Deputy General Counsel*  
Laura C. Tipton\*  
*Deputy General Counsel*  
Office of the Governor  
700 Capitol Avenue, Suite 106  
Frankfort, KY 40601  
(502) 564-2611  
[travis.mayo@ky.gov](mailto:travis.mayo@ky.gov)  
[taylor.payne@ky.gov](mailto:taylor.payne@ky.gov)  
[laurac.tipton@ky.gov](mailto:laurac.tipton@ky.gov)

*Counsel for the Office of the Governor*

**AARON M. FREY**

ATTORNEY GENERAL OF MAINE

By: /s/ Sarah A. Forster

Sarah A. Forster\*

*Assistant Attorney General*  
Office of the Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Tel.: (207) 626-8800  
Fax: (207) 287-3145  
[Sarah.Forster@maine.gov](mailto:Sarah.Forster@maine.gov)

*Counsel for the State of Maine*

**ANDREA JOY CAMPBELL**

ATTORNEY GENERAL OF MASSACHUSETTS

By: /s/ Katherine Dirks

Katherine Dirks\*

*Chief State Trial Counsel*  
Jonathan Green\*  
*Division Chief*  
Veronica Zhang\*  
*Assistant Attorney General*  
*Non-Profit Organizations / Public Charities*  
Massachusetts Office of the Attorney General  
1 Ashburton Pl. Boston, MA 02108  
(617) 963-2277  
[katherine.dirks@mass.gov](mailto:katherine.dirks@mass.gov)

*Counsel for the Commonwealth of  
Massachusetts*

**DANA NESSEL**

ATTORNEY GENERAL OF MICHIGAN

By: /s/ Neil Giovanatti

Neil Giovanatti\*

Alexus Ringstad\*

*Assistant Attorneys General*  
Michigan Department of Attorney General  
525 W. Ottawa  
Lansing, MI 48909  
(517) 335-7603  
[GiovanattiN@michigan.gov](mailto:GiovanattiN@michigan.gov)  
[RingstadA@michigan.gov](mailto:RingstadA@michigan.gov)

*Counsel for the People of the State of  
Michigan*

**KEITH ELLISON**

ATTORNEY GENERAL OF MINNESOTA

By: /s/ Liz Kramer

Liz Kramer\*

*Solicitor General*  
Minnesota Attorney General's Office  
445 Minnesota Street, Suite 1400  
St. Paul, Minnesota, 55101  
(651) 757-1010  
[Liz.Kramer@ag.state.mn.us](mailto:Liz.Kramer@ag.state.mn.us)

*Counsel for the State of Minnesota*

**AARON D. FORD**

ATTORNEY GENERAL OF NEVADA

By: /s/ Heidi Parry Stern

Heidi Parry Stern\*

**MATTHEW J. PLATKIN**

ATTORNEY GENERAL OF NEW JERSEY

/s/ Jessica L. Palmer

Jessica L. Palmer\*

*Solicitor General*  
Office of the Nevada Attorney General  
555 E. Washington Ave., Ste. 3900  
Las Vegas, NV 89101  
[HStern@ag.nv.gov](mailto:HStern@ag.nv.gov)

*Counsel for the State of Nevada*

**RAÚL TORREZ**  
ATTORNEY GENERAL OF NEW MEXICO

By: /s/ James W. Grayson  
James W. Grayson\*  
*Chief Deputy Attorney General*  
New Mexico Department of Justice  
P.O. Drawer 1508  
Santa Fe, NM 87504-1508  
(505) 490-4060  
[jgrayson@nmdoj.gov](mailto:jgrayson@nmdoj.gov)

*Counsel for the State of New Mexico*

**JEFF JACKSON**  
ATTORNEY GENERAL OF NORTH CAROLINA

**LAURA HOWARD**  
CHIEF DEPUTY ATTORNEY GENERAL

By /s/ Daniel P. Mosteller  
Daniel P. Mosteller\*  
*Associate Deputy Attorney General*  
North Carolina Department of Justice  
PO Box 629  
Raleigh, NC 27602  
(919) 716-6026  
[dmosteller@ncdoj.gov](mailto:dmosteller@ncdoj.gov)

*Counsel for the State of North Carolina*

Lauren E. Van Driesen\*  
*Deputy Attorneys General*  
Office of the Attorney General  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
(609) 696-4607  
[Jessica.Palmer@law.njoag.gov](mailto:Jessica.Palmer@law.njoag.gov)

*Counsel for the State of New Jersey*

**LETITIA JAMES**  
ATTORNEY GENERAL OF NEW YORK

By: /s/ Jessica Ranucci  
Jessica Ranucci\*  
*Special Counsel, Federal Initiatives*  
Rabia Muqaddam\*  
*Special Counsel for Federal Initiatives*  
Office of the Attorney General  
28 Liberty St.  
New York, NY 10005  
(929) 638-0447  
[Jessica.ranucci@ag.ny.gov](mailto:Jessica.ranucci@ag.ny.gov)  
[rabia.muqaddam@ag.ny.gov](mailto:rabia.muqaddam@ag.ny.gov)

*Counsel for the State of New York*

**DAN RAYFIELD**  
ATTORNEY GENERAL OF OREGON

By: /s Sadie Forzley  
Sadie Forzley\*  
*Senior Assistant Attorney General*  
Oregon Department of Justice  
100 SW Market Street  
Portland, OR 97201  
(971) 673-1880  
[sadie.forzley@doj.oregon.gov](mailto:sadie.forzley@doj.oregon.gov)

*Counsel for the State of Oregon*

**JOSH SHAPIRO**

IN HIS OFFICIAL CAPACITY AS GOVERNOR OF  
THE COMMONWEALTH OF PENNSYLVANIA

By: /s/ Kenneth L. Joel

Kenneth L. Joel\*

*Deputy General Counsel*

Benjamin Holt\*

*Chief Counsel*

*Pennsylvania Department of Labor*

Melissa Murphy\*

*Senior Counsel*

*Pennsylvania Department of Labor*

Governor's Office of General Counsel

30 N. 3rd St., Suite 200

Harrisburg, PA 17101

(717) 649-8669

[kennjoel@pa.gov](mailto:kennjoel@pa.gov)

*Counsel for Governor Josh Shapiro*

**CHARITY R. CLARK**

ATTORNEY GENERAL OF VERMONT

By: /s/ Jonathan T. Rose

Jonathan T. Rose\*

*Solicitor General*

Office of the Vermont Attorney General

109 State Street

Montpelier, VT 05609

(802) 828-3171

[Jonathan.rose@vermont.gov](mailto:Jonathan.rose@vermont.gov)

*Counsel for the State of Vermont*

**JOSHUA L. KAUL**

ATTORNEY GENERAL OF WISCONSIN

**PETER F. NERONHA**

ATTORNEY GENERAL OF RHODE ISLAND

By: /s/ Kyla Duffy

Kyla Duffy\*

*Special Assistant Attorney General*

Rhode Island Attorney General's Office

150 South Main Street

Providence, RI 02903

(401) 274-4400, Ext. 2809

[kduffy@riag.ri.gov](mailto:kduffy@riag.ri.gov)

*Counsel for the State of Rhode Island*

**NICHOLAS W. BROWN**

ATTORNEY GENERAL OF WASHINGTON

By: /s/ Abby Kahl

Abigail Kahl\*

Andrew R.W. Hughes\*

*Assistant Attorneys General*

Office of the Attorney General

2425 Bristol Court SW

Second Floor

PO Box 40117

Olympia, WA 98504

360-534-4864

[Abigail.Kahl@atg.wa.gov](mailto:Abigail.Kahl@atg.wa.gov)

[Andrew.Hughes@atg.wa.gov](mailto:Andrew.Hughes@atg.wa.gov)

*Counsel for the State of Washington*

By: /s/ Charlotte Gibson

Charlotte Gibson\*

*Assistant Attorney General*

Wisconsin Department of Justice

P.O. Box 7857

Madison, WI 53707

(608) 957-5218 (phone)

(608) 294-2907 (fax)

*Counsel for the State of Wisconsin*

*\* Motion for admission pro hac vice forthcoming*



**CERTIFICATE OF SERVICE**

I certify that on May 6, 2025, I electronically filed the foregoing document and its attachments via CM/ECF and thereby served all parties who have appeared through counsel on the Court's electronic docket.

For Plaintiff States whose counsel's motions for admission pro hac vice are forthcoming, I served the foregoing document and its attachments via email to those counsel.

Respectfully submitted,

/s/ Keith M. Jamieson

Keith M. Jamieson (D. Md. Bar. No. 31543)

*Assistant Attorney General*

Federal Accountability Unit

Office of the Attorney General

200 Saint Paul Place

Baltimore, Maryland 21202

(410) 576-6960

[kjamieson@oag.state.md.us](mailto:kjamieson@oag.state.md.us)